

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

ROBERT W. CLOUGH, II, on behalf of
himself and others similarly situated,

Plaintiff

v.

PLYMOUTH ROCK ASSURANCE
CORPORATION and AVENGE DIGITAL,
LLC,

Defendants

CIVIL ACTION NO. 1:20-cv-00345-LM

AVENGE DIGITAL, LLC,

Counterclaim-Plaintiff

v.

ROBERT W. CLOUGH, II,

Counterclaim-Defendant.

**THE PARTIES' STIPULATION OF DISMISSAL WITH PREJUDICE PURSUANT TO
FED. R. CIV. P. 41(a)(1)(A)(ii)**

Plaintiff Robert W. Clough, II and Defendants Plymouth Rock Assurance Corporation and Avenge Digital LLC (the Parties) pursuant to Fed.R.Civ.P. 41(a)(1)(A)(ii) and through counsel, hereby stipulate and agree to the dismissal of this action and all claims that were or could have been asserted in this lawsuit with prejudice and to waive all rights of appeal, with each party to bear its own fees and costs. None of the rights of any putative class members, except Plaintiff, are released or affected by this dismissal. However, this dismissal does dismiss the above-referenced lawsuit with prejudice.

Respectfully submitted,

PLYMOUTH ROCK ASSURANCE
CORPORATION and AVENGE DIGITAL,
LLC,

By their attorneys,

/s/ Joseph M. Cacace

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Dated: February 9, 2021

PLAINTIFF,
By his attorneys

/s/ Edward A. Broderick

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CERTIFICATE OF SERVICE

I, Edward A. Broderick, hereby certify that the foregoing document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

/s/ Edward A. Broderick

Edward A. Broderick

Dated: February 9, 2021